

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA**

---

In re:

BKY Case No.: 23-42304

Chapter 7

Hakim Wakil-Asim Alhaqq,

Debtor.

---

**APPLICATION FOR APPROVAL OF EMPLOYMENT OF ATTORNEY**

---

1. Applicant, Patti J. Sullivan, is the Chapter 7 Trustee (“**Trustee**”) in this case.
2. Applicant believes that the employment of an attorney is necessary to represent or assist the Trustee in carrying out the Trustee’s duties as follows: to perform legal services related to My Credit Union’s unperfected lien in a 2018 Chevrolet Equinox.
3. Matthew R. Burton and Moss & Barnett, (“**Firm**”), 150 South Fifth Street, Suite 1200, Minneapolis, MN 55402 are qualified by reason of practice and experience to render such representation or assistance to the Trustee.
4. Proposed compensation and reimbursement of expenses are as follows \$525.00 per hour for Matthew R. Burton, plus expenses, subject to Court approval.
5. Said professional has disclosed to the undersigned that he has the following connections with the debtor, creditors, or any other party-in-interest, their respective attorneys and accountants, the United States Trustee or any person employed in the Office of the United States Trustee: None, except the Firm represents the Trustee and other panel trustees in unrelated matters.
6. No conflict of interest arises by the Firm’s representation of the Trustee.
7. The Trustee has made the following efforts to recover assets prior to submitting this Application: The Trustee obtained and reviewed documents related to the bankruptcy case, conducted the first meeting of creditors, and sent correspondence to My Credit Union regarding the aforementioned unperfected vehicle lien and has not received a reply.

WHEREFORE, Applicant requests that the Court approve the employment of the Firm.

Dated: January 18, 2024

*s/ Patti J. Sullivan*

---

Patti J. Sullivan, Trustee (#170124)  
1595 Selby Avenue, Suite 205  
St. Paul, MN 55104  
P: (651) 699-4825  
E: patti@pattisullivan.com

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA**

---

In re:

BKY Case No.: 23-42304

Chapter 7

Hakim Wakil-Asim Alhaqq,

Debtor.

---

**VERIFIED STATEMENT PURSUANT TO FEDERAL RULE 2014(a)**

---

I, Matthew R. Burton and Moss & Barnett (“**Firm**”), 150 South Fifth Street, Suite 1200, Minneapolis, MN 55402, named in the application for employment on behalf of the above- named bankruptcy estate, declare under penalty of perjury the following:

1. I do not hold or represent any interest adverse to the estate and am disinterested as required by 11 U.S.C. § 327.
2. Said professional has disclosed to the undersigned that he has the following connections with the debtor, creditors, or any other party-in-interest, their respective attorneys and accountants, the United States Trustee or any person employed in the Office of the United States Trustee: None, except the Firm represents the Trustee and other panel trustees in unrelated matters.
3. No conflict of interest arises by the Firm’s representation of the Trustee.

**MOSS & BARNETT**

Date: January 18, 2024

*s/ Matthew R. Burton*

---

Matthew R. Burton (#210018)  
150 South Fifth Street, Suite 1200  
Minneapolis, MN 55402  
P: (612) 877-5399; F: (612) 877-5066  
E: Matthew.Burton@lawmoss.com

**ATTORNEYS FOR PATTI J. SULLIVAN,  
TRUSTEE**

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA**

---

In re:

BKY Case No.: 23-42304

Chapter 7

Hakim Wakil-Asim Alhaqq,

Debtor.

---

**DECLARATION REGARDING ELECTRONIC FILING AND  
UNSWORN CERTIFICATE OF SERVICE**

---

I, Susan M. Tschann, declare that on January 18, 2024, I caused the following documents:

Application for Approval of Employment of Attorney, Verified Statement and Order

to be filed electronically with the Clerk of Court through ECF, and that the above documents will be delivered by automatic e-mail notification pursuant to the rules of ECF and this constitutes notice pursuant to Local Rule 9006-1(a).

I further certify that on January 18, 2024, I e-mailed a copy of the foregoing documents to each entity named below at the e-mail address stated below for each entity:

[Sarah.J.Wencil@usdoj.gov](mailto:Sarah.J.Wencil@usdoj.gov)

And, I declare, under penalty of perjury, that the foregoing is true and correct.

Executed on: January 18, 2024

s/ Susan M. Tschann  
Susan M. Tschann  
Sullivan Law Firm, P.A.  
1595 Selby Avenue  
Suite 205  
Saint Paul, MN 55104  
(651) 699-4825  
susie@pattisullivan.com

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA**

---

In re:

BKY Case No.: 23-42304  
Chapter 7

Hakim Wakil-Asim Alhaqq,

Debtor.

---

**ORDER**

---

The Trustee's application to approve the employment of Moss & Barnett as the Trustee's attorneys came before the Court.

Based on the application, the recommendation of the United States Trustee and 11 U.S.C. § 327,

**IT IS ORDERED:** the employment is approved.

BY THE COURT:

Dated:

---

Katherine A. Constantine  
Chief United States Bankruptcy Judge